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FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 FUJIAN JINHUA INTEGRATED CIRCUIT
CO., LTD., et al.,

16 Defendant.
17

Case No. 18-CR-465 MMC

**DECLARATION OF
CHRISTINE Y. WONG IN
SUPPORT OF MOTION FOR A
BILL OF PARTICULARS**

18 I, Christine Y. Wong, hereby declare and state on information and belief:

19 1. I am the attorney of record for defendant Fujian Jinhua Integrated Circuit Co., Ltd.
20 ("Jinhua").

21 2. Jinhua was indicted on September 27, 2018, on three counts of federal charges that
22 included conspiracy to commit economic espionage, conspiracy to commit theft of trade secrets,
23 and economic espionage.

24 3. As of January 23, 2019, the government has produced the following materials
25 electronically stored on a CD-ROM:
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- Approximately 600 pages of 71 PDF documents, mainly consisting of news articles and witness statements made to Taiwanese investigators and prosecutors;
- A 7-minute and 10-second video file that was recorded on or about October 23, 2016, likely during the “UMC/Jinhua recruiting event in the Northern District of California” as alleged in Indictment ¶ 46;
- Five Excel spreadsheets that consist of about 19,000 line items of raw data on the Internet usage history of Wang Yungming (a.k.a Kenny Wang), one of the individual defendants in the above-captioned case;
- Five mostly unintelligible .txt files that are contained in a sub-folder called “Native” with the filenames, respectively, of “Activities_1,” “Activities_2,” “Files_1,” “Quota_1,” and “Quota_2”; and
- A further collection of 71 mostly unintelligible .txt files that are contained in a sub-folder called “Ocr” with the same filenames as those of the 71 PDF documents.

I hereby declare under penalty of perjury under the laws of the United States and this Court that the foregoing is true and correct to the best of my knowledge.

Executed January 23, 2019 in San Francisco, California.



CHRISTINE Y. WONG